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Core Optical Technologies, LLC

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 CORE OPTICAL TECHNOLOGIES,
11 LLC,

12 Plaintiff,

13 v.

14 APPLE INC., a California corporation,
15 EQUINIX, INC., a Delaware
16 corporation, VERIZON
17 COMMUNICATIONS, INC., a
18 Delaware corporation, GOOGLE LLC, a
19 Delaware limited liability company,
20 AT&T, INC., a Delaware corporation,
21 and BLOOMBERG L.P., a Delaware
22 limited partnership.

23 Defendants.

CASE NO: 21-cv-03075-VKD

**[PROPOSED] ORDER GRANTING
STAY OF PROCEEDINGS**

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1 WHEREAS, Plaintiff Core Optical Technologies, LLC (“Core”) and Defendants
 2 Apple Inc., Equinix, Inc., Verizon Communications, Inc., Google LLC, AT&T, Inc.,
 3 Bloomberg L.P. (together, the “Defendants”) (collectively, “the Parties”) have
 4 stipulated to a stay of the proceedings in this case, while the underlying case between
 5 Core and Juniper (N.D. Cal. Case No. 21-cv-02428 (“the *Juniper* case”)) proceeds;

6 WHEREAS, the Parties represent that the resolution of certain issues in the
 7 *Juniper* case could potentially streamline issues in this case;

8 WHEREAS, the Parties agree that, during the stay, Core may seek discovery
 9 from Defendants via Rule 45 subpoena(s) served in the *Juniper* case, and that the
 10 Defendants reserve all rights to object to any such subpoena (except to object based on
 11 the entry of this stay); and,

12 WHEREAS, the Court finds that judicial and party economy would be best
 13 served by granting the Parties’ requested stay.

14 THEREFORE, for good cause shown, it is HEREBY ORDERED THAT:

15 1. All proceedings between Core and the Defendants, except proceedings
 16 pursuant to Rule 45 in the *Juniper* case, are hereby STAYED;

17 2. The Parties shall meet and confer, and jointly report to the Court regrading
 18 continuation of the stay and the requested duration of the stay, on or before the earlier
 19 of: (i) May 31, 2022; or (ii) two weeks before the final pre-trial conference in the
 20 *Juniper* case; and

21 3. This stay shall remain in effect until dissolved by order of the Court.

22 **IT IS SO ORDERED**

23
 24 Date: _____

 Hon. Virginia K. DeMarchi